

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Art Van Furniture, LLC, *et al.*,

Debtors.¹

Alfred T. Giuliano, solely in his capacity
as the Chapter 7 Trustee of Art Van
Furniture, LLC, *et al.*,

Plaintiff,

V.

Archie A. Van Elslander Trust dated November 26, 1982, as Amended, the Estate of Archie A. Van Elslander, Gary A. Van Elslander, Gary A. Van Elslander Revocable Trust, David P. Van Elslander, Debra A. Van Elslander, Debra A. Van Elslander Revocable Trust, Kenneth A. Van Elslander, Kenneth A. Van Elslander Revocable Trust, Sandra L. Seroka, Karen B. Paglino, Karen B. Paglino Revocable Trust, Lori J. Webb, Kim M. Van Elslander a/k/a Kim M. Campau, Kris A. Scarfone, Beth M. Wood, AV Conner Holdings, Inc., VEV Real Estate LLC and Richard Kim Yost, and John Does 1-100,

Defendants.

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

PLEASE TAKE NOTICE that McDermott Will & Emery LLP hereby enters its appearance (this “Notice of Appearance”) in the above-captioned main and adversary cases (collectively, the “Cases”) as counsel to Archie A. Van Elslander Trust dated November 26, 1982, the Estate of Archie A. Van Elslander, Gary A. Van Elslander, Gary A. Van Elslander Revocable Trust, David P. Van Elslander, Debra A. Van Elslander, Debra A. Van Elslander Revocable Trust, Kenneth A. Van Elslander, Kenneth A. Van Elslander Revocable Trust, Sandra L. Seroka, Karen B. Paglino, Karen B. Paglino Revocable Trust, Lori J. Webb, Kim M. Van Elslander a/k/a Kim M. Campau, Kris A. Scarfone, Beth M. Wood, AV Conner Holdings, Inc., and VEV Real Estate LLC (collectively, the “Van Elslander Defendants”) pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), and rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). McDermott Will & Emery LLP hereby requests that copies of any and all notices and papers filed or entered in the Cases be given to and served upon the following:

McDERMOTT WILL & EMERY LLP
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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile, electronically, or otherwise, that is filed or given in connection with the above-captioned Cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives (i) any right to have final orders in non-core matters arising in or related to the above-captioned chapter 7 cases entered only after de novo review by a district court judge, (ii) any right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (iii) any right to have a district court judge withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) an election of remedies, or (v) any other substantive or procedural right. Further, the filing of this Notice of Appearance shall not waive the right of counsel to the Van Elslander Defendants to seek dismissal from the above-captioned adversary proceeding of defendants Archie A. Van Elslander Trust dated November 26, 1982, and the Estate of Archie A. Van Elslander, on grounds that such entities do not exist and therefore cannot properly be named as defendants and/or served with process.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against a debtor or any other entity either in these cases or in any other action are expressly reserved.

Dated: Wilmington, Delaware
June 10, 2022

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst
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